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Attorneys for Creditors American President Lines, Ltd.  
and APL Co. Pte Ltd.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:
<b>In re:</b>	:
	: <b>Chapter 11</b>
<b>DELPHI CORPORATION, <i>et al.</i>,</b>	:
	: <b>Case No. 05-44481</b>
	:
<b>Debtors.</b>	: <b>(Jointly Administered)</b>
	:
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**NOTICE OF APPEARANCE AND REQUEST BY APL  
FOR SERVICE OF ALL PAPERS AND NOTICES**

TO THE HONORABLE ROBERT D. DRAIN,  
UNITED STATES BANKRUPTCY JUDGE:

PLEASE TAKE NOTICE that, pursuant to § 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Orrick, Herrington & Sutcliffe LLP (“Orrick”) hereby enters its appearance as counsel for creditors American President Lines, Ltd. and APL Co. Pte Ltd. (collectively, “APL”) in these chapter 11 cases.

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Rules 2002 and 9007, on behalf of APL, Orrick requests that all notices given or required to be given and all

papers served or required to be served in these cases be given to or served upon:

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PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code § 1109(b) and Bankruptcy Rules 2002 and 9007, the foregoing request includes, in addition to the notices and papers referred to in such Bankruptcy Rules, all orders and notices of any hearing, motion, application, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral and whether sent by mail, hand delivery, telephone, facsimile or otherwise.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request by APL for Service of All Papers and Notices shall not be deemed or construed to be a waiver of the rights of APL to (i) have final orders in non-core matters entered only after *de novo* review by a United States District Judge, (2) trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, or (3) have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request by APL for Service of All Papers and Notices is without prejudice to: (1) any rights, remedies, claims, actions, defenses, setoffs, or recoupments, to which APL is or may be entitled to, in law or in equity, against the Debtors and any other entities either in these cases or in any other action, all of which rights, remedies, claims, actions, defenses, setoffs and recoupments are expressly

reserved; and (2) any objection which may be made to the jurisdiction of the Court, and shall not be deemed or construed to submit APL to the jurisdiction of the Court.

Dated: New York, New York  
October 14, 2005

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: /s/ Alyssa Englund (AE 2300)

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*and*

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Attorneys for Creditors American President Lines,  
Ltd. and APL Co. Pte Ltd.

# CERTIFICATE OF SERVICE

[illegible]

Alyssa Englund, an attorney duly admitted in the State of New York, says:

I, Alyssa Englund, a member in good standing of the bar of this Court, am an attorney associated with the law firm of Orrick, Herrington & Sutcliffe LLP, 666 Fifth Avenue, New York, New York 10103. I hereby certify under penalty of perjury that, on October 14, 2005, I caused true copies of the foregoing Notice of Appearance and Request By APL for Service of All Papers and Notices to be served upon each of the parties on the annexed service list by first class mail, postage paid thereon.

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Alyssa Englund

**SERVICE LIST**

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